

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA**

CASE NO. 1:24-cv-21136-LEIBOWITZ/TORRES

TUSHBABY, INC.,

Plaintiff,

v.

FLEEROSE, a Foreign Corporation,

Defendant.

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**DECLARATION OF LEO M. LICHTMAN**

I, Leo M. Lichtman, declare and state as follows:

1. I am a partner at ESCA Legal LLC, which represents TUSHBABY, Inc. (“TUSHBABY”) in this action. This declaration is based upon my personal knowledge of the facts stated herein or on the business records that were made at the time or in the regular course of business. If called as a witness, I could and would testify to the statements made herein.

2. I submit this declaration in further support of Plaintiff’s Motion to Dismiss Defendant Fleerose’s Counterclaims.

3. Attached hereto as **Exhibit 1** is a true and correct copy of the published patent application, Pub. No. US2016/0286980 A1, to which Defendant FLEEROSE refers in its counterclaims. [ECF No. 90, at ¶ 74].

I declare under penalty of perjury that the foregoing is true and correct.

Executed on October 7, 2024, in Brooklyn, New York.

  
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Leo M. Lichtman